

Felony

## UNITED STATES DISTRICT COURT

United States District Court  
Southern District of Texas  
FILEDfor the  
Southern District of Texas

MAY 4 2015

David J. Bradley, Clerk of Court

United States of America  
v.

Case No. B-15-MJ-418

Magdalena GUZMAN

Defendant

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of May 2, 2015 in the county of Cameron in the Southern District of  
Texas, the defendant violated 21 U.S.C. § 841 & 846,

an offense described as follows:

Knowingly and intentionally import, possess and conspire to possess with the intent to distribute approximately 5.46 kilograms of cocaine, a Schedule II Controlled Substance. Furthermore, the defendant did knowingly and intentionally conspire and agree with persons known and unknown to unlawfully possess with intent to distribute approximately 5.46 kilograms of cocaine, a Schedule II Controlled Substance, that is the object of the conspiracy.

This criminal complaint is based on these facts:

On May 2, 2015, Magdalena GUZMAN, a United States citizen, attempted to make entry into the United States from Mexico at the Gateway Bridge Port of Entry in Brownsville, Texas, as the sole occupant and driver of a 2005 Chevrolet Malibu Maxx bearing TX license plates [REDACTED]. At Customs and Border Protection (CBP) pre-primary inspection, GUZMAN gave a negative declaration for any contraband. While at pre-primary inspection, a CBP canine alerted to the rear area of the Malibu and GUZMAN was referred to secondary for further inspection. At secondary inspection, CBP Officers observed that the Malibu's dashboard bolts appeared to have been tampered with. Upon further inspection, CBP Officers located packages concealed within the Malibu's dashboard area. A total of five (5) packages were removed from the Malibu's dashboard area and all packages contain a white powdery substance which field tested positive for cocaine. The five packages had an approximate total weight of 5.46 kgs.

☐ Continued on the attached sheet.

Complainant's signature

Oscar Lara, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: May 4, 2015

Judge's signature

City and state: Brownsville, Texas

Ronald G. Morgan, U.S. Magistrate Judge

Printed name and title